

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., *et al.*,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)

Jointly Administered

Related Docket Nos. 19581, 19620, 21544

**NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)
AND FEDERAL RULES OF BANKRUPTCY PROCEDURE 9014 AND 730
DIRECTED TO THE LIBBY CLAIMANTS**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, applicable to proceedings related to the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W. R. Grace & Co., et. al., The Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants Representative, and The Official Committee of Equity Security Holders Dated February 27, 2009 (the "Plan") by Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, Arrowood Indemnity Company f/k/a Royal Indemnity Company ("Arrowood"), will take the deposition upon oral examination of the Libby Claimants, the Unofficial Committee of Libby Claimants, and the entity or group for which the Libby Claimants are functioning as a group, on the Subject Matters set forth in Exhibit A attached hereto, before a notary public or an officer authorized by law to administer oaths. The deposition will take place at the offices of Bifferato Gentilotti, LLC, 800 N. King Street, Plaza Level, Wilmington, DE 19801, June 15, 2009, at 1:00 p.m. (Eastern Time), or on such other date and at such other location as mutually agreed by Arrowood and the Libby Claimants, and shall continue from day to day until concluded. The deposition shall be taken by stenographic means. You are invited to attend and participate.

Pursuant to Fed R. Civ. P. 30(b)(6), the Libby Claimants shall designate one or more persons who consent to testify on their behalf as to all facts and other information known or reasonably available to the Libby Claimants relating to the Subject Matters set forth in Exhibit A attached hereto.

Dated: June 11, 2009
Wilmington, Delaware

/s/ Garvan F. McDaniel
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EXHIBIT A

ADDITIONAL DEFINITIONS

1. Capitalized terms not defined herein shall have the meanings given to them in the Plan Proponents' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W.R. Grace & Co., et. al., the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants Representative, and the Official Committee of Equity Security Holders Dated February 27, 2009.

2. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Document Requests any Documents or information that might otherwise be construed to be outside their scope.

3. "BNSF" means the BNSF Railway Company and its predecessors, the Great Northern Railway Company, the Burlington Northern Railroad Company, and the Burlington Northern & Santa Fe Railway Company.

4. The terms "communication" and "communications" are used in the broadest sense and include, without limitation, any oral or written transmittal of information or request for information made from one Person to another, whether made in person, by telephone or by any other means, or a Document made for the purpose of recording a communication, idea, statement, opinion or belief.

5. "You" or "your" in the Subject Matters below refer to the Libby Claimants.
the entity or group for which the Libby Claimants are functioning as a group.

SUBJECT MATTERS

1. The bases for your objections to confirmation.
2. The bases for your claimed asbestos bodily injury claims against the Debtors and BNSF.
3. Your Communications with the Debtors and BNSF concerning claims for asbestos bodily injury, the First Amended Joint Plan of Reorganization, and insurance.
4. The bases you contend you have for asserting any claim against Arrowood.